

### NSF-ISR, LTD SURVEILLANCE AUDIT REPORT

A. Program Participant's Name: Michigan DNI	FRS #1: 5Y031
B. Scope:	
Land management on 3.9 million acres of Mich military lease lands) and related sustainable for the Sustainable Forestry Initiative Standard.	`
<ul><li>☐ No Change</li><li>☐ Changed (revised scope statement also not</li></ul>	ed on FRS)
C. NSF Audit Team:	
Lead Auditor: Mike Ferrucci Auditor	Dr. Robert Hrubes
<b>D. Audit Date(s):</b> March 8-10, 2006	
E. Reference Documentation:	
2005-2009 SFI Standard® Michigan DNR Forest Certification Work Instr	uctions, Date Revised: 02-07-06
F. Audit Results: Based on the results at this visit	, the auditor concluded
☐ Acceptable with no nonconformances; or	
Acceptable with existing minor nonconformances scheduled surveillance visit;	that should be corrected before the next regularly
☐ Not acceptable with one or two major nonconform	nances - corrective action required;
☐ Several major nonconformances - the certification	n may be canceled unless immediate action is taken
Company Representative:	Date: <u>05-18-06</u>
NSF-ISR Representative: Michael Fe	Date: <u>03-10-06</u>

This acknowledges the NSF-ISR Audit Team's visit to this location and the SFI Program Participant's receipt of this report and 0 new Corrective Action Request (CAR) forms.

G. Changes to Operations or to the SFI Standard:
Are there any significant changes in operations, procedures, specifications, FRS, etc. from the previous visit? $\square$ Yes $\boxtimes$ No
If yes, provide brief description of the changes: Minor revisions to "Work Instructions"
H. Other Issues Reviewed:
Note: This was a Supplemental Surveillance Audit designed to focus on the Minor Non-conformances and on the continued implementation of the "Forest Certification Work Instructions".
I. Corrective Action Requests: (see also Appendix IV)
Correct Action Requests issued this visit: NONE
<ul> <li>□ Corrective Action Plan is required within sixty days of this visit (for Minor Nonconformances). CARs will be verified during the next Surveillance Audit.</li> <li>□ Corrective Action Plan is required within thirty days of this visit (for Major Nonconformances). The auditor will make arrangements to verify the corrective action has been effectively implemented. All major nonconformance(s) must be closed by the auditor prior to the next scheduled surveillance audit by a special verification visit or by desk review, if possible.</li> <li>Any Corrective Action Plans should be mailed to:         <ul> <li>Mike Ferrucci, 26 Commerce Drive, North Branford, CT 06471</li> </ul> </li> </ul>
At the conclusion of this Surveillance Audit visit, the following number of CARs remain open:
MAJOR(S): <u>0</u> MINOR(S): <u>5</u>
In addition, no new Opportunities For Improvement (OFIs) were identified.
Appendices:
Appendix I: Surveillance Notification Letter and Audit Schedule Appendix II: Agreement to Not Consult and to Not Disclose Appendix III: Attendance Sheets Appendix IV: Corrective Action Requests Appendix V: Summary Surveillance Audit Report Appendix VI: Audit Matrix

#### APPENDIX I



# Surveillance Notification Letter and Audit Schedule

From: Dennis Nezich [nezichd@michigan.gov]
Sent: Friday, December 09, 2005 8:31 AM

**To:** Mike Ferrucci **Cc:** Robert Hrubes

Subject: RE: Supplemental Winter 2006 Audit

Mike and Robert,

We can shoot and tentatively plan for March 6-8 but it is very questionable whether we will get a contract in place by that time. We will do our best to start the process now, however, we will be limited in what we can accomplish until we actually get certified.

From: Mike Ferrucci [interforest@earthlink.net]
Sent: Wednesday, December 07, 2005 9:45 AM

**To:** 'Robert Hrubes': 'Dennis Nezich'

Cc: 'Cara Boucher'; 'Lynne Boyd'; 'Ronald Murray'; 'Lawrence Pedersen'

Subject: RE: Supplemental Winter 2006 Audit

#### Dennis:

Robert and I had previously discussed a 3-day audit, 1 day on your offices in Lansing and 2 days in the field. Only Robert and I would participate. Our objectives would include confirming completion of items explicitly mentioned in the CARs, continuing implementation of the new work instructions, and an opportunity to review some winter harvests. I believe Robert provided our rationale clearly in his email message.

I agree that a March audit would be acceptable. Scheduling it for early to mid-March would appear to be more likely to allow for our third objective, the review of field operations on snow and frozen ground. Perhaps there is some risk of an early break-up. Considering our desire to visit one FMU in the northern lower and one in the eastern Upper Peninsula, can you advise us of the risk of harvesting operations being shut down if the supplemental audit is delayed until mid- or late-March?

Perhaps you can try to expedite the paperwork and attempt to get this approved in time for an audit on March 6-8. Failing that, we can push it back later in the month. March is generally not a busy month for field work, so I don't mind holding a second set of dates as a fall-back position.

### **APPENDIX II**



## Agreement to Not Consult and to Not Disclose

#### AGREEMENT TO NOT DISCLOSE AND TO NOT CONSULT



**IN CONSIDERATION** of my appointment to represent NSF International Strategic Registrations, Ltd. (NSF-ISR) and conduct management systems audits of the documentation, operations, and facilities of:

Michigan DNR (5Y031) P.O. Box 30452 Lansing, MI 48909-7952

(hereinafter called "NSF-ISR's Client") for registration by NSF-ISR, I agree as follows:

- 1. I will not at any time during or subsequent to this agreement disclose or use in any way any information or knowledge or data I receive or develop while providing service for NSF-ISR, including but not limited to, plans, lists, prospects lists, and trade secrets of NSF-ISR or its client.
- While representing NSF-ISR, I may have access to confidential business information from NSF-ISR's client and others, and may be authorized to handle this information in the performance of my responsibilities. I can assume that this is proprietary information to the client or parties supplying it, and agree it may not be revealed by me to others outside NSF-ISR. I agree to maintain this information in a secure manner that prevents any accidental disclosure. Unauthorized disclosure or handling of confidential business information may result in disciplinary action, including but not limited to cancellation of my appointment to represent NSF-ISR. Should my authorization to handle confidential information be revoked while I am appointed to represent NSF-ISR, or as a result of cancellation of my appointment to represent NSF-ISR, I understand that my obligation not to reveal confidential business information will still be in force.
- 3. Upon cancellation of my appointment to represent NSF-ISR for any reason, I agree to promptly deliver to NSF-ISR all physical property, plans, designs, computer programs, computer lists, prospect lists, records, letters, notes, reports, and all other materials relating to NSF-ISR or its client in my possession or under my control.
- 4. I hereby attest that I have not provided consultation or other services related to the SFI program or management system to NSF-ISR's client for at least two years, and to preclude any actual or perceived conflict of interest, I agree to not enter into any agreement, provide consultation or other services to NSF-ISR's client (for whom I participated in any audit) except for services under this agreement, for a period of two years after completion of services under this agreement. Certification or auditing under a recognized standard is not subject to the above prohibitions.
- 5. I shall not participate in an appraisal or advise a potential purchaser or broker a purchase of property audited within the prior three years without the written permission of the audited party. I shall notify the audited party of participation in such activities after the three-year period immediately upon initiation of such activities for a period of at least 10 years following the audit. I shall disclose to the party requesting this audit any prior land appraisal or assessment work or land brokerage activity I or my employers has conducted related to the property to be audited.

Signature

Michael Fesseun

Michael Ferrucci, March 7, 2006

#### AGREEMENT TO NOT DISCLOSE AND TO NOT CONSULT



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- While representing NSF-ISR, I may have access to confidential business information from NSF-ISR's client and others, and may be authorized to handle this information in the performance of my responsibilities. I can assume that this is proprietary information to the client or parties supplying it, and agree it may not be revealed by me to others outside NSF-ISR. I agree to maintain this information in a secure manner that prevents any accidental disclosure. Unauthorized disclosure or handling of confidential business information may result in disciplinary action, including but not limited to cancellation of my appointment to represent NSF-ISR. Should my authorization to handle confidential information be revoked while I am appointed to represent NSF-ISR, or as a result of cancellation of my appointment to represent NSF-ISR, I understand that my obligation not to reveal confidential business information will still be in force.
- 3. Upon cancellation of my appointment to represent NSF-ISR for any reason, I agree to promptly deliver to NSF-ISR all physical property, plans, designs, computer programs, computer lists, prospect lists, records, letters, notes, reports, and all other materials relating to NSF-ISR or its client in my possession or under my control.
- 4. I hereby attest that I have not provided consultation or other services related to the SFI program or management system to NSF-ISR's client for at least two years, and to preclude any actual or perceived conflict of interest, I agree to not enter into any agreement, provide consultation or other services to NSF-ISR's client (for whom I participated in any audit) except for services under this agreement, for a period of two years after completion of services under this agreement. Certification or auditing under a recognized standard is not subject to the above prohibitions.
- 5. I shall not participate in an appraisal or advise a potential purchaser or broker a purchase of property audited within the prior three years without the written permission of the audited party. I shall notify the audited party of participation in such activities after the three-year period immediately upon initiation of such activities for a period of at least 10 years following the audit. I shall disclose to the party requesting this audit any prior land appraisal or assessment work or land brokerage activity I or my employers has conducted related to the property to be audited.

(signed copy on file at NSF-ISR)	
Signature	

Dr. Robert Hrubes, March 7, 2006



### **APPENDIX III**



## SFI/FSC Audit Attendance Sheets

Michigan DNR, Lansing/Newberry Michigan (FRS # 5Y031)

Opening Meeting: March 8, 2006 Closing Meeting: March 10, 2006

NAME	TITLE/POSITION	OPENING MEETING	CLOSING MEETING
Mike Ferrucci	NSF SFI Lead Auditor	X	X
Dr. Robert Hrubes	SCS FSC Lead Auditor	X	X
Dennis Nezich	Forest Certification Specialist	X	X
Mike Donovan	Wildlife Research	X	
Lisa Dygert	GIS Analyst	X	
Penney Melchoir	NWMgmt Unit Sup. – Wildlife Cadillac OSC	X	
Jim Radabaugh	Recreation and Trails Manager	X	
Kim Herman	Monitoring Specialist	X	
Kerry Fitzpatrick	Habitat Specialist (WLD)	X	
Jason Stephens	Silviculturist	X	
Doug Heym	Timber Sales Specialist	X	
Craig Howard	Managing Director, Bioforest	X	X
Mike Paluda	FMFM UP Forest Manager	X	
David Price	FMFM/ FC Planner	X	
Larry Pedersen	Planning and Operations Manager	X	X
Lynne Boyd	Chief FMFM	X	
	See Also Newberry Attendance Sheet for other Closing Meeting Attendees		

## SFI/FSC Audit Attendance Sheets Michigan DNR, FRS # 5Y031

## Grayling, Michigan - March 9, 2006

NAME	TITLE/POSITION
Mike Ferrucci	NSF SFI Lead Auditor
Dr. Robert Hrubes	SCS FSC Lead Auditor
Dennis Nezich	Forest Certification Specialist
Craig Howard	Managing Director, Bioforest
Larry Pedersen	Planning and Operations Manager
Lucas Merrick	Forester, Grayling
Mark Montei	Forester, Grayling
Patrick Potter	Forester, Grayling
Craig Farrer	Forest Tech, Grayling
Patrick Cotant	Forester, Grayling
Susan Thiel	Unit Manager, Grayling FMU
John Pilon	Inventory and Planning Specialist
Robin Pearson	FMFM Recreation Specialist Gaylord OSC
Cameron Rohdy	Equipment Operator
Barb Sands	Secretary FMFM Grayling
Joel Money	Fire Officer, Grayling
Larry Allwardt	Fire Rec Supervisor, Grayling
Jack Money	Fire Officer
Jason Lewicki	Forester
George Kerschenheiter	Wildlife Technician
Steve Anderson	Unit Manager, Roscommon
Jim Bielecki	Silviculturist
Paige Perry	Trails Analyst, ELP
Bill O'Neill	FMFM
Steve Sendek	Fisheries Biologist, Grayling
Elaine Carlson	Wildlife Biologist, Mio
Joan Charlebois	Forester, Grayling
Keith Kintigh	Wildlife Biologist, Gaylord

## SFI/FSC Audit Attendance Sheets Michigan DNR, FRS # 5Y031

## Newberry, Michigan - March 10, 2006

NAME	TITLE/POSITION	CLOSING MEETING
Both Meetings		
Mike Ferrucci	NSF SFI Lead Auditor	X
Dr. Robert Hrubes	SCS FSC Lead Auditor	X
Dennis Nezich	Forest Certification Specialist	X
Craig Howard	Managing Director, Bioforest	X
Larry Pedersen	Planning and Operations Manager	X
Les Homen	FMFM Newberry Unit Manager	X
OSC Meeting Participants		
Mike Paluda	FMFM UP Forest Manager	
Sharolynn Robinson	DNR FMFM OLAF	
Ann Mattson	Admin Area Manager OLAF	
John Cischke	Law Division	
Wayne Wheeler	DNR FMFM	
Steve Scott	Lake Superior Basin Coordinator	
Dan Moore	EUP Recreation Specialist	
Don Kuhr	Timber Management Specialist Newberry	
Bob Moody	Fisheries	
Rex Ainslie	Wildlife	
Bob DeVillez	FMFM	
Sherry MacKinnon	Wildlife Division	
Newberry Unit Meeting		
Jason Tokar	FMFM Newberry	X
Keith Magnusson	Forester, FMFM Newberry	X
Kristie Sitar	WLD Wildlife Biologist	X
Ed Rice	Forester, FMFM Newberry	X
Michael Hill	Forest Fire Officer, FMFM Newberry	X
Brian Mensch	Forest Fire Officer, FMFM Newberry	X
Paul Gaberdiel	Fire Supervisor, FMFM Newberry	X
Theresa Sysol	Forester, FMFM Newberry	X

## APPENDIX IV



## Corrective Action Requests

Company/Location: MI DNR	Date: <u>9-20-05</u> FRS # <u>5Y031</u>	
Auditor: Mike Ferrucci, Jodi Kaiser	CAR Number: MF-2005-01B	
Location of Finding: Cadillac FMU C12 Sale#63-009-03-01	Previous CAR Number/Date: NA	
Discussed with: Steve Nyhoff, Bill O'Neil and others	Nonconformance Type (underline): Major <b>Minor</b>	
AUDITOR FINDING: Standard Number and Clause: 2005-2009 SFIS Performance Measure 5.1 Visual Management Program		

Managers shall manage the impact of harvesting on visual quality.

Description: Operations Inventory (O.I.) Forest Management Division comment about leave trees in the Cycle Oak Sale stated "mark oak trees to leave for visual management and protection of trail" yet in field no marks could be seen (sale not yet cut). Concerns were addressed by DNR personnel, by explaining that instead of painting leave trees they "did address the leave tree issue with the 4-inch (retention) spec rather than a 2-inch spec". This was confirmed by review of 3.26.02 Compartment Review Notes for C12, and this decision was implemented in the contract "Cutting Specifications". However, on the closed sale "Squidwood Oak" O.I. comment for leave trees in the Squidwood Sale stated "mark oak trees to leave for visual management for trails and Three Mile Road" for Stands 82 and 83, and "leave JP and oak trees in clumps." Leave trees were not left. Thus there was a lack of visual management for Three Mile Road. Other similar situations were encountered during the audit, in which recommendations during planning process were not carried out in the field.

#### IF NECESSARY, PLEASE ATTACH A SEPARATE REPORT ADDRESSING THE FOLLOWING THREE ITEMS:

- 1) ROOT CAUSE ANALYSIS BY COMPANY-Include potential causes & assurance problem does not exist in other areas. The cause of this problem is failure to follow current procedures and perform what was prescribed in operations inventory. Similar operational shortcomings were found during Michigan DNR's internal audit and management review in 2005.
- 2) CORRECTIVE ACTION BY COMPANY Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date. Work Instruction 7.1 states that Foresters and Forest Technicians are to complete a Timber Pre-sale Checklist to assure that all management intentions as recorded in the inventory system have been provided for in the sale. The monitoring section of this work instruction, assigns the QA/QC responsibility to the Unit Manager.
- 3) PREVENTIVE ACTION BY COMPANY Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

Michigan DNR will continue to implement operational procedures as outlined in Work Instruction 7.1. Field Coordinators will review and address shortcomings identified during the management review process (internal audits). Work Instruction 7.1 will be amended to more clearly state that the FMFM Unit Manager is responsible for ensuring that operations inventory prescriptions and timber sale preparation specifications match.

#### AUDITOR REVIEW OF COMPANY'S PLAN:

This plan places emphasis on implementing Work Instruction 7.1 including a "Timber Pre-sale Checklist", which is a fairly recent process. Implementation will be reviewed during Surveillance Audits over the next year.

STATUS: OPEN AUDITOR/DATE: Michael Ferrucci 11.16.05

#### AUDITOR REVIEW OF COMPANY'S COMPLETED ACTION:

Reviewed and confirmed existence of revised pre-sale checklist and staff knowledge of it. Discussed process for checking done by FMU Managers, by WL Wildlife Biologists, and by Timber Management Specialists. Need to verify effective implementation in the field during the regular 2006 Surveillance Audit scheduled for fall, 2006.

AUDITOR/DATE: Mike Ferrucci, 3-10-06 STATUS: Open

Company/Location: MI DNR	Date: 9-21-05 FRS # 5Y031
Auditor: Mike Ferrucci	CAR Number: MF-2005-02
Location of Finding: Gladwin FMU, Comp. 124	Previous CAR Number/Date: NA
Discussed with: <u>Steve Nyhoff, Bill O'Neil &amp; others</u>	Nonconformance Type (underline): Major Minor

AUDITOR FINDING: Standard and Clause: 2005-2009 SFIS Indicator 5.3.3 "Green-up" requirement.

Description: Trees in adjacent clearcut areas were not 3 years old or 5 feet tall. Despite operational and economic considerations, alternative methods to reach the performance measure were not employed in the critical portion of the sale. Compartment 124, Stands 36 & 38 Jack Pine clearcut 73-040-99-01, Stand 22 Unit 9 73-005-03-01, and Stand 20 Unit 6 73-005-03-01are adjacent. From SW to NE, Stand 22 is furthest to rear, 36/38 are in the middle, and 20 is nearest to Jack Pine Trail, a paved public road. A large subdivision is located ¾ mile to the east of these sales, and DNR staff indicated that residents of the subdivision picked blueberries in these areas prior to and after harvest. A protest blockage of the furrowing equipment was described to the auditors, indicating a continuing high interest in this area even after the trees were harvested. The design and layout of the harvests incorporated many aspects of visual management, except for the conjunction of adjacent stands 20 and 38. At the time of the audit all four adjacent stands were not regenerated, and this adjacency requirement of SFI was not met. See details below.

#### Stand 36 and 38 Jack Pine clearcut 73-040-99-01

(Note: Stand 36 is listed on Timber Sale Completion Report as Stand 138) "Arenac Double Jack" Sale is a 56-acre pine presalvage clearcut completed October 2002 (payments made 9-30-02 and 10-8-02, final inspection report 10-31-02). 10-18-99 memo from Gladwin FMU Forester indicates it is susceptible to Jack Pine Budworm outbreak with assistance from Forest Health Specialist. It was cut outside of the normal YOE Compartment Review process for this reason, and proper procedure followed. Some natural regeneration JP seedlings under 15 inch height present, uncertain if there are currently enough to meet stocking. FTP # C73781 "Artificial Regeneration of jack pine and red pine" final approval 4-28-05. Stand recently furrowed, not yet planted, indicating that target levels of regeneration not yet met.

#### Stand 22 Unit 9 73-005-03-01

"JP Complex Unit 9" 49 acre clearcut of 56-year old Jack pine started January 26, 2005. Adjacent to Stand 36 above, but separated by 100-foot wide uncut buffer except small portion at east end, furthest from road. Good visual.

#### Stand 20 Unit 6 73-005-03-01

"JP Complex Unit 6" is a 23-acre clearcut of 66-year old Jack Pine harvested at the same time as Unit 9. This is a non-conformance with the SFI standard 5.3.3. No evidence of urgency regarding health, nor were any other methods employed to manage the esthetic impact of placing this unit adjacent to Stand 38 (no separation buffer was left, and few residual trees present are not positioned to provide buffer. Trees in adjacent Stand 38 were not established at desired level of stocking, and were not 3 years old. (Note: Stand 36 is listed on Timber Sale Completion Report as Stand 138.)

#### IF NECESSARY, PLEASE ATTACH A SEPARATE REPORT ADDRESSING THE FOLLOWING THREE ITEMS:

1) ROOT CAUSE ANALYSIS BY COMPANY-Include potential causes & assurance problem does not exist in other areas.

Forest health: No buffer was left between stands 20 and 38 because both were cut to reduce the risk of mortality due to jack pine budworm (see stand list on following page from Roger Mech, Forest Health Specialist). A significant modification of the original sale was made to modify the visual impact of the large clearcut area following the Visual Management Checklist in use at the time of the sales. The original sale, Arenac Double Jack, included stands 36 and 38 which were listed as high risk for jack pine budworm and cut out of year-of-entry. Because of the concern for the aesthetic impact of a large clearcut, stand 38 was divided, reserving 23 acres which were in slightly better condition. This reserved portion became stand 20 which was harvested later. The Corrective Action Request states "No evidence of urgency regarding forest health..." However, there was evidence that forest health was an urgent risk for the stands involved in these sales. The original risk assessment for loss to jack pine budworm listed stand 38 as high risk and the follow-up assessment in 2004 listed the northern portion of old stand 38 (which became stand 20) as high risk. Although the original sale was reduced in area to manage the aesthetic impact, it did not reduce the risk to the remaining stand. It remained necessary to harvest stand 20 before the adjacency requirement had been met to address the forest health risk. Had the entire stand been harvested at one time, there would not have been an issue with adjacency, yet the aesthetic impact of the harvest operation would have been worse. In this case, the aesthetic impact of the large area was deferred, but now, because they are two separate units, they are subject to the adjacency requirement.

Lack of alternative measures: One alternative measure to reduce the visual impact of the clearcut would have been to leave some scattered oak trees. However, the oak in the stand was prescribed to be cut to facilitate the regeneration work. The considerations made were not fully documented in a pre-sale checklist or in OI stand remarks, Note also, that a significant buffer was left along the paved road to the north of the sale areas in order to moderate visual impact of the sale.

Operating instructions: These sales were set up and executed following the operating instructions in place at the time the work was done. The relevant operating instructions regarding clearcut size and visual management were properly employed. All of this work was conducted prior to the Department's commitment to follow the SFI standard regarding green-up

- 2) **CORRECTIVE ACTION BY COMPANY** Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.
- 3) **PREVENTIVE ACTION BY COMPANY** Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

The Michigan DNR will document future visual considerations that will include the green-up requirement of the SFI Standard. The pre-sale checklist has since been modified to include an explicit check for adjacency and green-up requirements. This change was completed on 10/14/2005.

#### AUDITOR REVIEW OF COMPANY'S PLAN:

The measures described in the Root Cause Analysis (Part 1) were not fully understood by the audit team when the CAR was issued, but fail to convince the Lead Auditor that the issue was adequately considered at the time the sale layout decision was made, in part because these decisions predated the adoption of the SFI Standard by the Michigan DNR. The lead auditor is convinced by additional evidence provided herein that forest health issues were involved in the timber harvest decisions, but objective evidence does not exist to document alternative methods employed to provide for visual quality as per the SFI requirements. No corrective action (Part 2) is possible. The proposed preventative action (Part 3) is appropriate, as it involves a new process that incorporates SFI requirements and focuses on improved documentation. Implementation, including the use of the modified "Pre-sale checklist" that now includes visual considerations, will be reviewed in the Surveillance Audit scheduled for the fall of 2006.

STATUS: OPEN AUDITOR/DATE: Michael Ferrucci 11.16.05

#### AUDITOR REVIEW OF COMPANY'S COMPLETED ACTION:

Reviewed and confirmed existence of revised pre-sale checklist and staff knowledge of it. The form is beginning to be used. Need to verify effective implementation in the field during the regular 2006 Surveillance Audit scheduled for fall, 2006.

STATUS: Open AUDITOR/DATE: Mike Ferrucci, 3-10-06

Company/Location: MI DNR	Date: <u>9-23-05</u> FRS # <u>5Y031</u>
Auditor: Jodi Kaiser	CAR Number: <u>JK-2005-03</u>
Location of Finding: Atlanta Comp. 50 Stand 262	Previous CAR Number/Date: <u>NA</u>
Discussed with: Jim Bielecki, Bill O'Neil & Unit Staff	Nonconformance Type (underline): Major Minor

**AUDITOR FINDING:** Standard Number and Clause: 2005-2009 SFIS PM 1.1Indicators 1a, 3, 4, and 5. Also relates to Performance Measure 2.1.

Description: Inventory and planning methods are not always correctly applied. During office review of paperwork, Auditor Jodi Kaiser found a discrepancy between Jack Pine inventory/objective for the stand and post cruise data as part of a proposal for an aspen harvest, with Aspen also coded as objective for the future stand. Biologist recommended drumming logs based on Aspen coding. Drumming logs did not appear on the timber sale prospectus or contract, and thus were not implemented. Despite an initial search for records by Atlanta staff there is no documentation for a changed objective. Field review with Lead Auditor and FMFM and Wildlife staff showed that OI was correct. Field review of site confirmed there had been little aspen in the stand prior to harvest, there are many Jack Pine stumps, and there is little aspen sprouting. Thus Jack Pine should be the objective. As a consequence of this coding error there is no Forest Treatment Proposal (FTP) for planting, and no entry on the Planting Plan maintained by the Timber Management Specialist. (After new work instructions are implemented this type of error could also result in no entry into the time clock, but audit team welcomes additional analysis on this final point.)

Note: Root cause analysis needs to include evidence that this is not a systematic problem.

#### IF NECESSARY, PLEASE ATTACH A SEPARATE REPORT ADDRESSING THE FOLLOWING THREE ITEMS:

1) ROOT CAUSE ANALYSIS BY COMPANY–Include potential causes & assurance problem does not exist in other areas. The cause of this problem is failure to follow current procedures to record accurate stand data in the timber sale proposal. QA/QC measures did not work in regard to finding and correcting coding error. Michigan DNR found similar coding errors during internal audits (Management Review) and considers the root cause of the problems to be failure to follow procedures as directed in Work Instruction 7.

An FTP for planting stand 262 of compartment 50 is attached to this response. Although the FTP could not be located on the day of the Atlanta audit, it did exist. A copy of the FTP was provided to Jodi Kaiser during the second week of the audit. Regeneration plans are adequate.

2) **CORRECTIVE ACTION BY COMPANY** – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

Work Instruction 7.1 states that Foresters and Forest Technicians are to complete *Timber Pre-sale Checklist*. This pre-sale check prompts the administrator to assure that all management intentions as recorded in the inventory system have been provided for in the timber sale. In addition, the monitoring section of Work Instruction 7.1 assigns the QA/QC function to the Unit Manager.

3) **PREVENTIVE ACTION BY COMPANY** – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

Michigan DNR will continue to implement operational procedures as outlined in Work Instruction 7.1. Field Coordinators will review and address quality control shortcomings found through the Management Review process (internal audits). Work Instruction 7.1 will be revised to more clearly state that the FMFM Unit Manager is responsible for ensuring that operations inventory prescriptions and timber sale proposal coding match.

#### **AUDITOR REVIEW OF COMPANY'S PLAN:**

Additional evidence provided by Michigan DNR indicates that an FTP was prepared. A non-conformance still exists, and the root cause, corrective, and preventive actions are appropriate. Implementation of Work Instruction 7.1 will be assessed during Surveillance Audits over the next year.

STATUS: OPEN AUDITOR/DATE: Michael Ferrucci 11.16.05

#### AUDITOR REVIEW OF COMPANY'S COMPLETED ACTION:

Discussed process for checking timber sales against Operations Inventory and Compartment Review recommendations that is carried out by FMU Managers, by WL Wildlife Biologists, and by Timber Management Specialists. Also reviewed knowledge of Work Instruction 7.1 by field foresters. Need to verify effective implementation in the field during the regular 2006 Surveillance Audit scheduled for fall, 2006.

STATUS: Open AUDITOR/DATE: Mike Ferrucci, 3-10-06

Company/Location: MI DNR	Date: 9-20-05 FRS # 5Y031	
Auditor: Mike Ferrucci, Jodi Kaiser, Dave Capen	CAR Number: MF-2005-04B	
Location of Finding: Numerous field locations	Previous CAR Number/Date: NA	
Discussed with: Dennis Nezich, FCIT	Nonconformance Type (underline): Major Minor	
<b>AUDITOR FINDING:</b> Standard Number and Clause: 2005-200 equivalent BMPs during all phases of management activities.	99 SFIS Indicator 3.1: Program to implement state or provincial	
Several instances of Best Management Practice (BMP) violations were observed by the audit team, all of which were already logged into the Michigan DNR violations system (or were recorded as the team observed the non-conformances), but many of these have not yet been corrected. Implementation of corrective actions for all of the recently identified internal BMP non-conformances are not complete, and would not be expected to be complete, given the recent vintage of the internal BMP monitoring program as part of the new Forest Certification Work Instructions. The DNR is to be commended for designing a robust and comprehensive internal inspection and internal audit protocol. Given the number of BMP non-conformances this Minor Non-Conformance is designed to help the NSF Lead Auditor monitor the entire program with respect to implementation of BMPs. Progress against the BMP violations will be assessed during subsequent Surveillance Audits.		
IF NECESSARY, PLEASE ATTACH A SEPARATE REPO	RT ADDRESSING THE FOLLOWING THREE ITEMS:	
1) ROOT CAUSE ANALYSIS BY COMPANY–Include potential causes & assurance problem does not exist in other areas. Michigan DNR has created procedures for recognizing, documenting, and repairing BMP non-conformances in the implementation of the MDNR Action Plan (a response to the scoping audit in October of 2005). BMP violation reporting, tracking and monitoring was restructured into a more cohesive statewide system using Work Instruction 3.2. This protocol was very recently rolled out, consequently many FMUs are currently gathering and compiling information on BMP violations. This process is used to document BMP problems, prioritize activities, and carry out repairs, and is in the early stage of implementation.		
2) CORRECTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.		
Protocols are in place and staff are implementing them based on Work Instructions 3.1, 3.2 and 3.3. A BMP electronic database and form will be developed.		
3) PREVENTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.		
DNR is presently using the process described in the work instructions. This process began in June of 2005, and is used to protect water quality and site productivity. Management Review will prioritize reported problems and identify remedial actions to address the most ecologically significant BMP problems. A Management Review is scheduled for December 2005.		
AUDITOR REVIEW OF COMPANY'S PLAN: The proposed corrective and preventive actions are appropriate. Implementation of Work Instructions 3.1, 3.2 and 3.3 will be assessed during Surveillance Audits over the next year.		
STATUS: OPEN	AUDITOR/DATE: Michael Ferrucci 11.16.05	
AUDITOR REVIEW OF COMPANY'S COMPLETED ACTION:  The special March 2006 Surveillance Audit afforded little opportunity to assess implementation of CAP. Confirmed that \$382,000 in funding as made available for FY 2006 to address the list of BMP problems.  STATUS: OPEN  AUDITOR/DATE: Mike Ferrucci 03-10-06		

#### Michigan DNR 2006 Supplemental Audit

Company/Location: MI DNR	Date: <u>9-20-05</u> FRS # <u>5Y031</u>
Auditor: Mike Ferrucci, Jodi Kaiser	CAR Number: MF-2005-05
Location of Finding: Numerous field locations	Previous CAR Number/Date: NA
Discussed with: Dennis Nezich, FCIT	Nonconformance Type (underline): Major Minor

**AUDITOR FINDING:** Standard Number and Clause: 2005-2009 SFIS 12.2.4. Recreation opportunities for the public, where consistent with forest management objectives.

Despite strong evidence of increased emphasis on management of ORV impacts and enforcement of ORV laws in recent years, and evidence of important progress since the Gap Analysis/Scoping of October, 2004, illegal ORV use continues to impact some streams and wetlands. Budgets for Conservation Officers have been declining in recent years, and an even larger reduction is planned for the next fiscal year. Conservation officers are supported in their work by Forest Officers, who are specially-trained Forest Fire Officers. However the Forest Officer Program is currently a voluntary program for Forest Fire Officers and has declining participation.

The primary responsibilities of both Forest Officers and Forest Fire Officers include fire fighting and recreation, with staffing declining despite increasing recreational demand. It is thus unlikely that the Forest Officers will be able to provide much support to Conservation Officers in the area of law enforcement, specifically the area of ORV laws and regulations. Further, the recent increase in emphasis on enforcement of ORV regulations is not likely to be sustained, and damage to the resources will very likely begin to increase once again.

Certification does not expect perfection, but does expect a reasonable degree of "continuous improvement". Given the size and quality of the DNR trail and road system, the increasing popularity of ORVs, and human nature, damage from illegal ORV use will always occur, and in fact continued throughout the 2-week audit. The audit team observed two ORVs being used on a closed trail, having just forded a high-quality stream where banks were eroding. Numerous other examples of ORV damage were observed by the audit team; these examples and many others are currently logged into the Michigan DNR's BMP violation tracking system. Some work to close these BMP issues (repair the damages and possibly construct preventative barriers) has occurred, but most are still uncorrected.

Implementation of corrective actions for all of the recently identified ORV-related BMP non-conformances are not complete, and would not be expected to be complete, given the recent roll-out of the program. The DNR is to be commended for designing a robust and comprehensive internal inspection and internal audit protocol. Given the number of BMP non-conformances this Minor Non-Conformance is designed to help the NSF Lead Auditor monitor implementation of BMPs to repair ORV damage.

#### IF NECESSARY, PLEASE ATTACH A SEPARATE REPORT ADDRESSING THE FOLLOWING THREE ITEMS:

1) ROOT CAUSE ANALYSIS BY COMPANY–Include potential causes & assurance problem does not exist in other areas. DNR has been monitoring and tracking ORV use and impacts over time. Assessments, plans and reviews related to ORVs occurred in 1979, 1991, 1991-1996 State Comprehensive Outdoor Recreation Plan (SCORP), 1997, 2000, 2003-2007 SCORP and 2005 ORV Plan (Nelson, Draft). These reports have consistently emphasized separating conflicting uses, developing recreation opportunities/trail, user education/training and enforcement (both self and law).

There is a factual error in the CAR related to the LED budget. The Fiscal Year (FY) 06 appropriation is up 31% over FY05. The auditors' observation suggests a perceived lack of permanent, fulltime DNR "officer" personnel as a cause of "resource damage from unauthorized ORV use" and a (presumably negative) "general condition of state forest roads". This approach fails to consider or recognize the DNR's efforts at addressing ORV and road problems via fulltime DNR ORV specialists, temporary and part-time employees, contractors, grants, volunteers, county road commissions, and local law-enforcement personnel. As a result, the "CAR" seems to require hiring uniformed personnel when other approaches may be more effective.

This is a long standing problem and there is concern that illegal ORV use will continue and is likely to increase over time resulting in resource damage. The State of Michigan has not developed an effective program to manage this problem.

2) **CORRECTIVE ACTION BY COMPANY** – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

DNR proposes to show, within one year, a wide array of efforts addressing ORV and road and bridge maintenance issues to include user education, enforcement, and remediation. Protocols are in place and staff are implementing them based on Work Instructions 3.1, 3.2 and 3.3. A BMP electronic database and form will be developed. Resource damage reports will be compiled, prioritized and corrective actions determined. Corrective actions will vary in intensity and activity depending on the degree, extent and level of damage. These data and concerns related to legal and illegal ORV use of state lands will be communicated to the ORV Advisory Board and the Forest Management Advisory Committee (DNR stakeholder boards).

3) **PREVENTIVE ACTION BY COMPANY** – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

By January 30, 2006 the DNR will create a task force that will be charged with defining a Department-wide strategy for addressing illegal ORV use. The strategy will be defined by June 30, 2006, and it will address three fronts including user education, enforcement, and maintenance/restoration. DNR will demonstrate additional progress by the time of the first annual surveillance audit.

#### **AUDITOR REVIEW OF COMPANY'S PLAN:**

Additional information provided in the Root Cause Analysis regarding an increase in the budget for the Law Enforcement Division (LED) provides assurance that the DNR is already making significant efforts to remedy this problem. The proposed corrective and preventive actions involve the development and implementation of an environmental management system (EMS) approach that includes assessment, remediation, and management review at multiple levels, including reviews by resource managers and by policy-makers. Implementation will be assessed during Surveillance Audit scheduled for the fall of 2006.

STATUS: OPEN AUDITOR/DATE: Michael Ferrucci 11.16.05

#### AUDITOR REVIEW OF COMPANY'S COMPLETED ACTION:

Confirmed that the ORV task force has been appointed, and that it has begun to meet. Confirmed that \$382,000 in funding as made available for FY 2006 to address the list of BMP problems, and that the ORV budget has been increased. Remainder of CAP will be assessed during the regular 2006 Surveillance Audit scheduled for fall, 2006.

STATUS: Open AUDITOR/DATE: Mike Ferrucci, 3-10-06

Company/Location: MI DNR	Date: 9-30-05 FRS # 5Y031	
Auditor: Mike Ferrucci	CAR Number: <u>MF-2005-06</u>	
Location of Finding: Marquette OSC	Previous CAR Number/Date: NA	
Discussed with: Dennis Nezich, others	Nonconformance Type (underline): Major Minor	
AUDITOR FINDING: Standard Number and Clause: 2005-200	09 SFIS 10.2.1, 12.2.1, 12.2.1 and 12.5.1	
Description: 10.2.1 Michigan DNR has been involved in some of the listed logger education efforts, but has had limited involvement with SFI Implementation Committee. No evidence was provided that the Michigan DNR supported the SIC in either the establishment of criteria or the identification of delivery mechanisms for wood producer's training courses.  12.1.1: To date, Michigan DNR has had Minimal involvement on SFI Implementation Committee. However, ample evidence exists for involvement by Michigan DNR with the full range of organizations listed in the Performance Measure 12.2.1: Michigan DNR has implemented numerous public outreach, education, and involvement initiatives, but not in conjunction with the SFI Implementation Committee.  12.5.1: Michigan DNR has had limited involvement with SFI Implementation Committee, and no evidence was provided that the Michigan DNR supported the SIC in its efforts to address concerns about inconsistent practices.		
IF NECESSARY, PLEASE ATTACH A SEPARATE REPO	RT ADDRESSING THE FOLLOWING THREE ITEMS:	
1) ROOT CAUSE ANALYSIS BY COMPANY–Include potential causes & assurance problem does not exist in other areas. The primary root cause is that the Michigan DNR is not yet certified under the SFI standard. The following past involvement occurred: FMFM Division Assistant Chief Bernie Hubbard attended the April 2004 and November 2004 Statewide Implementation Committee (SIC) meetings. Bernie Hubbard and Dennis Nezich (FMFM Forest Certification Specialist) attended the April 2005 SIC meeting. Forest Pest Specialist Robert Heyd provided Upper Peninsula SFE training in forest pest management and control of exotics. FMFM Unit Managers and staff attended and assisted in SFE logger training courses delivered by the MSU Extension Service.		
2) CORRECTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date. Dennis Nezich, FMFM Division Forest Certification Specialist, is the Department's representative that will attend SIC and SIC subcommittee meetings, and is the Department's point person for addressing inconsistent practices reported to the SFI statewide committee on their toll free line.		
3) PREVENTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.  Michigan DNR will actively participate in SIC meetings and SIC subcommittee meetings following SFI certification.		
AUDITOR REVIEW OF COMPANY'S PLAN: The proposed actions are appropriate. Implementation of will be assessed during Surveillance Audits over the next year.		
STATUS: OPEN	AUDITOR/DATE: Michael Ferrucci 11.16.05	
AUDITOR REVIEW OF COMPANY'S COMPLETED ACTION:  Dennis Nezich attended a November 3, 2005 MI SIC meeting and MI SFE committee meeting.		
STATUS: <u>CLOSED</u>	AUDITOR/DATE: Mike Ferrucci 3-24-06	

#### APPENDIX V



## SFI Surveillance Audit Summary for Public Disclosure

The SFI Program of the Michigan DNR has demonstrated continuing conformance with the Sustainable Forestry Initiative Standard ®, 2005-2009 Edition (SFIS), according to the NSF-ISR SFIS Certification Audit Process.

NSF-ISR initially certified the Michigan DNR to the SFIS on December 9, 2005. This report describes the first follow-up Surveillance Audit designed to focus on the new "Forest Certification Work Instructions" that guide the department's certification efforts and to track progress towards closing the Minor Non-conformances. In addition, the DNR's management review system and its efforts at continuous improvement were assessed and a subset of SFI requirements were selected for detailed review.

The Michigan DNR manages 3.9 million acres of State Forest land throughout the northern two-thirds of Michigan, using an interdisciplinary approach to integrate the harvesting of forest products, the provision of wildlife habitat, the protection of special sites, and the provision of extensive recreational opportunities. A variety of forest products are produced, including timber, pulpwood, firewood, cabin logs, poles, and other specialty products. Michigan DNR's SFI Program is managed by Dennis Nezich, Forest Certification Specialist.

The surveillance audit was performed by NSF-ISR on March 8 to 10, 2006 by an audit team headed by Mike Ferrucci, Lead Auditor. Audit team members fulfill the qualification criteria for conducting SFIS Certification Audits contained in the Sustainable Forestry Initiative® Audit Procedures and Qualifications (SFI APQ). The objective of the audit was to assess continuing conformance of the firm's SFI Program to the requirements of the Sustainable Forestry Initiative® Standard, 2005-2009 Edition.

The scope of the audit was land management on 3.9 million acres of Michigan State Forests and the related sustainable forestry activities covered by the SFIS. Field inspections focused on aspects of forest management affected by recent changes in the DNR program, and occurred in sites selected by the audit team within the Newberry and Grayling Forest Management Units. In addition, SFI obligations to promote sustainable forestry practices, to seek legal compliance, and to incorporate continual improvement systems were within the scope of the audit. All of the Performance Measures within SFIS Objective 8 (involving procurement of wood) were outside of the scope of the Michigan DNR SFI program and were excluded from the scope of the SFI Certification Audit. No indicators were modified from the standard set in the other SFIS Objectives (1-7 and 9-13). Use of the SFI logo and the requirement to provide a public summary of audit reports were also reviewed.

#### **SFIS Surveillance Audit Process**

The review was governed by a detailed audit protocol designed to enable the audit team determine conformance with the applicable SFI requirements. The process included the assembly and review of audit evidence consisting of documents, interviews, and on-site inspections of ongoing or completed forest practices. Documents describing these activities were provided to the auditor in advance, and a sample of the available audit evidence was designated by the auditor for review.

The possible findings for specific SFI requirements included Full Conformance, Major Non-conformance, Minor Non-conformance, Opportunities for Improvement, and Practices that exceeded the Basic Requirements of the SFIS. Surveillance Audits generally focus on conformance issues and do not generally address exceptional practices.

#### **Overview of Audit Findings**

The Michigan DNR's SFI Program was found to be in continuing conformance with the SFIS Standard. The NSF-ISR SFI Certification Audit Process found no new minor non-conformances or opportunities for improvement. The NSF-ISR Audit team reviewed all previous minor non-conformances and corrective action plans. These corrective action plans date from the October, 2005 audit, and must be closed by October 2006. Their status is as follows:

- 1: Performance Measure 5.1: "Program Managers shall manage the impact of harvesting on visual quality." The Michigan DNR has begun to implement a *Timber Pre-sale Checklist* to assure that all management intentions as recorded in the inventory system have been provided for in the sale. Need to verify effective implementation in the field during the regular 2006 Surveillance Audit scheduled for fall, 2006.
- 2: Indicator 5.3.3: "Green-up" requirement (adjacency issue). Confirmed revisions to the *Timber Pre-sale Checklist* to assure that all management intentions as recorded in the inventory system have been provided for in the sale. Need to verify effective implementation in the field during the regular 2006 Surveillance Audit scheduled for fall, 2006.
- 3: PM 1.1 Indicators 1a, 3, 4, and 5 involve the forest inventory and management planning. In some cases, differences between inventory and prescriptions (data coding errors) have affected or could affect implementation of sustainable forest management practices. Reviewed process for checking timber sales against Operations Inventory and Compartment Review recommendations that is carried out by FMU Managers, by WL Wildlife Biologists, and by Timber Management Specialists. Also reviewed knowledge of Work Instruction 7.1 by field foresters. Need to verify effective implementation in the field during the regular 2006 Surveillance Audit scheduled for fall, 2006.
- 4: Indicator 3.1 requires a program to implement BMPs during all phases of management activities. Michigan DNR has developed a system of internal checks against BMP requirements. Confirmed that \$382,000 in funding was made available for FY 2006 to address the list of BMP problems. Will confirm in fall, 2006.
- 5: Indicator 12.3.4 requires providing recreation opportunities for the public consistent with forest management objectives. The Michigan DNR provides an extensive array of recreation opportunities, and natural resources are generally well-protected. In some cases, illegal ORV use is causing damage that may be compromising environmental protections. Confirmed increased attention to these issues, including additional funding for repairs and for the overall trails program. Will confirm implementation of complete plan in fall, 2006.
- 6: Indicators 10.2.1, 12.2.1, 12.2.1, and 12.5.1 require involvement by the Michigan DNR in SFI Implementation Committee activities. Confirmed increased level of such involvement, and closed this CAR.

Progress in implementing the five remaining open corrective action plans will be reviewed in subsequent surveillance audits.

The audit team found that the Michigan DNR has made significant progress in improving its sustainable forestry program by instituting a comprehensive management review program, by increasing resources devoted to management plan updates, by creating special task forces to consider BMP and ORV issues, and by considerable efforts to address non-conformances and identified Opportunities for Improvement.

This program is being audited under the standard surveillance audit option provided in the SFI program. The next surveillance audit is scheduled for October 24-27, 2006.

#### **Relevance of Forestry Certification**

Third-party certification provides assurance that forests are being managed under the principles of sustainable forestry, which are described in the Sustainable Forestry Initiative Standard as:

#### 1. Sustainable Forestry

To practice sustainable forestry to meet the needs of the present without compromising the ability of future generations to meet their own needs by practicing a land stewardship ethic that integrates reforestation and the managing, growing, nurturing, and harvesting of trees for useful products with the conservation of soil, air and water quality, biological diversity, wildlife and aquatic habitat, recreation, and aesthetics.

#### 2. Responsible Practices

To use and to promote among other forest landowners sustainable forestry practices that are both scientifically credible and economically, environmentally, and socially responsible.

#### 3. Reforestation and Productive Capacity

To provide for regeneration after harvest and maintain the productive capacity of the forestland base.

#### 4. Forest Health and Productivity

To protect forests from uncharacteristic and economically or environmentally undesirable wildfire, pests, diseases, and other damaging agents and thus maintain and improve long-term forest health and productivity.

#### 5. Long-Term Forest and Soil Productivity

To protect and maintain long-term forest and soil productivity.

#### 6. Protection of Water Resources

To protect water bodies and riparian zones.

#### 7. Protection of Special Sites and Biological Diversity

To manage forests and lands of special significance (biologically, geologically, historically or culturally important) in a manner that takes into account their unique qualities and to promote a diversity of wildlife habitats, forest types, and ecological or natural community types.

#### 8. Legal Compliance

To comply with applicable federal, provincial, state, and local forestry and related environmental laws, statutes, and regulations.

#### 9. Continual Improvement

To continually improve the practice of forest management and also to monitor, measure and report performance in achieving the commitment to sustainable forestry.

Source: Sustainable Forestry Initiative® (SFI) Standard, 2005–2009 Edition

#### **For Additional Information Contact:**

Mike Ferrucci, SFI Program Manager, NSF-ISR 26 Commerce Drive North Branford, CT 06471 203-887-9248 mferrucci@iforest.com Dennis Nezich, Forest Certification Specialist Michigan Department of Natural Resources 1990 US-41 South, Marquette, MI 49855 906-228-6561 nezichd@michigan.gov

## APPENDIX VI



## Audit Matrix